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*Attorneys for Plaintiffs,*  
CANTERS DELI LAS VEGAS, LLC and  
CANTERS DELI TIVOLI VILLAGE LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CANTERS DELI LAS VEGAS LLC, a citizen  
of the state of California; and CANTERS  
DELI TIVOLI VILLAGE LLC, a citizen of the  
State of California,

*Plaintiffs,*

v.

BANC OF AMERICA MERCHANT  
SERVICES, LLC, a citizen of the States of  
Delaware and Georgia; BANK OF AMERICA,  
N.A., a citizen of the State of North Carolina;  
FREEDOMPAY, INC., a citizen of the States  
of Delaware and Pennsylvania; and DOES 1  
through 10,

*Defendants.*

CASE NO.: 2:18-cv-01908-KJD-NJK

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND RESPONSE AND  
REPLY DEADLINES IN  
CONNECTION WITH DEFENDANT  
FREEDOMPAY, INC.'S MOTION TO  
DISMISS OR, IN THE ALTERNATIVE,  
TO TRANSFER VENUE TO THE  
EASTERN DISTRICT OF  
PENNSYLVANIA**

**[FIRST REQUEST]**

Plaintiffs CANTERS DELI LAS VEGAS LLC and CANTERS DELI TIVOLI VILLAGE  
LLC (together, "Canters"), and Defendant FREEDOMPAY, INC. ("FreedomPay"), by and  
through their undersigned counsel of record, hereby stipulate and agree to extend the response  
and reply deadlines in connection with Defendant FreedomPay, Inc.'s Motion To Dismiss or, in  
the Alternative, to Transfer Venue to the Eastern District of Pennsylvania filed on November 8,  
2018 (Motion to Dismiss"), as follows:

WHEREAS, the current deadline for Canters to file a response to FreedomPay's Motion to  
Dismiss is November 26, 2018.

WHEREAS, on November 21, 2018, given that Canters' response deadline immediately

1 follows the Thanksgiving holiday, counsel for Canters and FreedomPay conferred and reached an  
2 agreement to extend the deadline for Canters to file and serve a response to FreedomPay's Motion  
3 to Dismiss up to and including December 3, 2018. The parties have also agreed to extend  
4 FreedomPay's reply deadline through December 10, 2018. This is the parties' first request for an  
5 extension of time.

6 THEREFORE, in consideration of the foregoing, the parties request that the Court modify  
7 the briefing schedule, as follows:

8 1. That the deadline for Canters to file a response to FreedomPay's Motion to  
9 Dismiss is extended up to and including **December 3, 2018**; and

10 2. That the deadline for FreedomPay to file a reply in support of FreedomPay's  
11 Motion to Dismiss is extended up to and including **December 10, 2018**.

12  
13 DATED this 21<sup>st</sup> day of November, 2018

DATED this 21<sup>st</sup> day of November, 2018

14 BROWNSTEIN HYATT FARBER  
15 SCHRECK, LLP

GORDON REES SCULLY MANSUKHANI,  
LLP

16 By: /s/ Adam K. Bult

By: /s/ Craig J. Mariam

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24 *CANTERS DELI LAS VEGAS, LLC and*  
25 *CANTERS DELI TIVOLI VILLAGE LLC*

*Attorney for Defendant*  
*FREEDOMPAY, INC.*

26 **IT IS SO ORDERED:**

27   
28 UNITED STATES DISTRICT JUDGE

Dated: 11/26/2018